

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

FILED-CLERK
U.S. DISTRICT COURT
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TEXAS- EASTERN
BY _____

SHANIKWA JOHNSON

V.

MARK WATERS, et al

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§

CIVIL ACTION NO. 6:03CV318
Honorable Leonard Davis

**DEFENDANTS MARK WATERS, DENNIS TAYLOR, J.B. SMITH,
AND SMITH COUNTY TEXAS' DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Defendants Mark Waters, Dennis Taylor, J.B. Smith, and Smith
County, Texas and file this their Designation of Expert Witnesses:

I. EXPERT DESIGNATIONS

1. Albert Rodriguez
11017 Crossland
Austin, Texas 78726

Mr. Rodriguez is a law enforcement expert and will testify consistently with his report
which has been disclosed to Plaintiff.

2. Robert S. Davis
Flowers Davis, P.L.L.C.
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701

Mr. Davis will testify as to the reasonable and necessary character of attorney's
fees, if necessary.

3. Christi J. Kennedy
Flowers Davis, P.L.L.C.
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701

Ms. Kennedy will testify as to the reasonable and necessary character of attorney's
fees, if necessary.

4. Azalea Orthopedic Sports Medicine Clinic
Carol Hinojosa, OTR
Dr. James R. Harris
Dr. Carey A. Clark, III.
Dr. Kendra King
3414 Golden Road
Tyler, Texas 75701

Plaintiff's medical providers and treating physicians will testify consistently with their records, which have all been provided and disclosed by Plaintiffs.

5. East Texas Medical Center
1000 Beckham
Tyler, Texas 75701

Plaintiff's medical providers and treating physicians will testify consistently with their records, which have all been provided and disclosed by Plaintiffs.


6. Andrews Center
P.O. Box 4730
Tyler, Texas 75712

Plaintiff's medical providers and treating physicians will testify consistently with their records, which have all been provided and disclosed by Plaintiffs.

Defendants reserve the right to call any experts listed by Plaintiff. Defendants also reserve the right to supplement as allowed by this honorable Court.

Respectfully submitted,

FLOWERS DAVIS, P.L.L.C.
1021 ESE Loop 323, Suite 200
Tyler, Texas 75701
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Robert S. Davis *(by permission)*
State Bar No. 05544200
Christi J. Kennedy
State Bar No. 00787772

ATTORNEYS FOR DEFENDANTS
MARK WATERS, DENNIS TAYLOR, SHERIFF
J.B. SMITH, AND SMITH COUNTY, TEXAS

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing instrument was served upon all counsel of record as follows in the above entitled and numbered cause this the 29th day of March, 2004, in the following manner:

☐ Via Facsimile

☒ Via Certified Mail, Return Receipt Requested _____

☐ Via First Class Mail

☐ Via Hand Delivery

Curtis B. Stuckey
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Robert S. Davis/KK.
Robert S. Davis (by permission)

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